Case 19-26873-MBK Doc 51 Filed 02/18/20 Entered 02/18/20 11:22:44 Desc Main Document Page 1 of 4

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Attorney for Debtor, Jason Sepulveda

UNITED STATES DISTRICT COURT FOR

THE DISTRICT OF NEW JERSEY

In the Matter of

JASON SEPULVEDA BANKRUPTCY Case # 19-26873 MBK

Hearing Date: 02/04/20 10:00 A.M

Chapter 13

DEBTORS CERTIFICATION IN RESPONSE TO CHAPTER 13 STANDING TRUSTEE'S OBJECTION TO EXEMPTIONS

- 1. I Jason Sepulveda, of full age make the following certification in response to the Chapter 13 Standing Trustees Objection to exemptions.
- 2. At the time of my case intake for my original bankruptcy filing, after my initial consultation with my attorney, some of the case intake was taken over the telephone.
- 3. Apparently during the process of the telephone intake, some of the models and years of the vehicles listed were incorrectly transcribed.
- 4. My attorney advises that they relied on Kelly Blue Book online to research the Fair Market Values of the listed vehicles.
- 5. During the process and preparing and submitting a chapter 13 plan, my attorney requested insurance cards and registrations for my vehicles.
- 6. Upon review, it was determined that incorrect vehicles had been listed on my petition.
- 7. The initial petition listed a 2017 Chevy Van and a 2004 Ford F150Pickup truck which was incorrect and I did not own those vehicles at the time of the filing of my petition.

- 8. After review and verification with my registration and insurance cards, my attorney filed an amended schedule A/B on December 2, 2019 which listed the corrected vehicles. The corrected vehicles included a Mercedes leased vehicle, a 2003 Chevy Van (not 2017), a 2005 Ford F 150 (not 2004), a 2012 Ford E 150 (same as the first schedule plus the addition of a 2003 Ford Van.
- 9. My attorney has advised that once again he relied on Kelly Blue Book on line to determine the FMV for these vehicles.

I hereby certify and submit that the vehicles as shown on my amended schedule A/B dated December 2 2019 are correct and that the 2 vehicles initially listed were not owned by me and listed on my petition in error.

I hereby certify that the foregoing is true. I am aware that if any statement made by me is knowingly false, I am subject to punishment.

Dated February 18, 2020

Jason Sepulveda

Jason Sepulveda

State of New Jersey, County of Ocean:

On February 18, 2020, Jason Sepulveda appeared before me and signed and executed the foregoing statement, after having made known the contents therein as his act and deed.

David G Esposito, Esq

An Attorney at Law in New Jersey

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DEBTORS ATTORNEY CERTIFICATION IN RESPONSE TO CHAPTER 13 STANDING TRUSTEE'S OBJECTION TO EXEMPTIONS

 David G. Esposito, Esq. makes the following response to the Standing Chapter 13 Trustee's Objection to Debtor Jason Sepulveda's Exemptions as follows:

- 2. This shall confirm that the Debtors petition was filed on an expedited basis with some of the intake completed by telephone to allow for an expedited filing. This will further acknowledge hat a review of the petition now reveals errors in the transcription of the vehicles listed by the debtor. This will further acknowledge that any error in the petition is a result of a clerical error on the part of my office and not related to any incorrect information submitted by the debtor
- 3. To the extent that the trustee objects to the stated equity of any assets, the debtor stipulates the trustees determination of those exemptions
- 4. Based on the foregoing, it is respectfully submitted that the debtor has adequately addressed the trustees objections requests that the trustees objection be withdrawn Respectfully submitted

/s/ David G Esposito, Esq

David G. Esposito, Esq., Attorney for debtor